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**From:** Michal Eldan [meldan@luxpam.com]  
**Sent:** 11/5/2020 8:54:43 PM  
**To:** Miller, David [Miller.DavidJ@epa.gov]; Niman, Aaron [niman.aaron@epa.gov]  
**Subject:** Nomination of phosphonic acid for use on citrus  
**Attachments:** 201105\_Nomination Form for CCPR.pdf; Reviewer Summary of fosetyl aluminum\_302 and phosphonic acid\_301.pdf; EPA stamped label\_42519-32-20200828.pdf

Dear David and Aaron,

Attached please find the nomination form for phosphonic acid use on citrus. I am also sending you the JMPR reviewer summary.

The review was not completed because a label was found that recommended use rate for postharvest treatment (1.2-3.5 gal/100 gal water) seemed to be higher than the rates used in the residue trials (4.2 lbs/gal). This label has now been revised to recommend only 1.2 gal/100 gal water (see attached EPA approval), i.e., 1.2 galX4.2 lbs per 100 gal, and that is less than 4.2 lbs/gal used in the residue studies.

We hope the nomination of phosphonic acid for use on citrus can now proceed.

Please do not hesitate to contact me should you have any question.

Best regards,

Michal

**MICHAL ELDAN, PHD**

VP, Health and Environment  
Luxembourg Industries Ltd | Luxembourg-Pamol, Inc.  
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T: +1-212-495-9717 | +972-52-469-5266  
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**From:** Michal Eldan  
**Sent:** Wednesday, November 04, 2020 5:58 AM  
**To:** 'Miller.DavidJ@epa.gov'; 'Niman.Aaron@epa.gov'  
**Subject:** A plan to submit nomination

Dear David and Aaron,

This is in response to your request to be advised of a plan to submit a nomination. You may recall that the US joined the nomination request of Australia for the review of phosphorous acid, adding citrus that was not included in the Australian nomination.

On November 17, 2016 we received the attached approval for the nomination, including direction regarding the information we should send to the reviewers. The information was sent on December 16, 2016.

In August of 2017 we received the attached e-mail message informing us that the GAP table for phosphorous acid included rates that exceeded the rate which had been used in the submitted residue studies. The review of phosphorous acid for citrus was stopped.

We were recently able to correct the situation by convincing the registrant of the problem label to reduce the recommended use rates. We believe that the current GAP Table for the product is addressed by the existing residue data.

If I understand correctly, we have to resubmit a request for nomination of application of phosphorous acid on citrus. We are planning to submit the nomination by November 8 (by the way, Friday is November 6).

I hope this is acceptable.

Thank you and best regards,

Michal

**MICHAL ELDAN, PHD**

VP, Health and Environment

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**From:** Niman, Aaron [<mailto:niman.aaron@epa.gov>]

**Sent:** Monday, November 02, 2020 9:58 AM

**To:** [Stephanie.Swinehart@usda.gov](mailto:Stephanie.Swinehart@usda.gov); [anna.gore@usda.gov](mailto:anna.gore@usda.gov); [mbasu@croplifeamerica.org](mailto:mbasu@croplifeamerica.org); [gforrer@whwg.com](mailto:gforrer@whwg.com); [dmanchester@croplifeamerica.org](mailto:dmanchester@croplifeamerica.org); [gregory.watson@bayer.com](mailto:gregory.watson@bayer.com); [mhoagland@central.com](mailto:mhoagland@central.com); [Leslie.Garcia@valent.com](mailto:Leslie.Garcia@valent.com); [Epstein@nwhort.org](mailto:Epstein@nwhort.org); Wilkins, Nancy; [yen\\_wu@mccormick.com](mailto:yen_wu@mccormick.com); [CodyWilson@coca-cola.com](mailto:CodyWilson@coca-cola.com); Vogel, Dana; [blandine.trouille@trade.gov](mailto:blandine.trouille@trade.gov); [dtrinka@blueberries.com](mailto:dtrinka@blueberries.com); [carmen.tiu@corteva.com](mailto:carmen.tiu@corteva.com); [selen.stromgren@fda.hhs.gov](mailto:selen.stromgren@fda.hhs.gov); [Matthew.Strietzel@bryantchristie.com](mailto:Matthew.Strietzel@bryantchristie.com); [jane.stewart@basf.com](mailto:jane.stewart@basf.com); [Ann.Stevenson@bryantchristie.com](mailto:Ann.Stevenson@bryantchristie.com); [SSpaulding@central.com](mailto:SSpaulding@central.com); [csmith@gowanco.com](mailto:csmith@gowanco.com); [jsevcik@elanco.com](mailto:jsevcik@elanco.com); [tscholz@usapulses.org](mailto:tscholz@usapulses.org); [mike@cmschofieldconsulting.com](mailto:mike@cmschofieldconsulting.com); [Jason.Sandahl@fas.usda.gov](mailto:Jason.Sandahl@fas.usda.gov); [RLuisa1@aol.com](mailto:RLuisa1@aol.com); [Mark.Rasmussen@fas.usda.gov](mailto:Mark.Rasmussen@fas.usda.gov); [cprice@calcitrusquality.org](mailto:cprice@calcitrusquality.org); Phang, Whang; [james.m.nyangulu@monsanto.com](mailto:james.m.nyangulu@monsanto.com); [Dougtnelson1@gmail.com](mailto:Dougtnelson1@gmail.com); Miller, David; [Sara.Mcgrath@fda.hhs.gov](mailto:Sara.Mcgrath@fda.hhs.gov); Ray McAllister; [Marie.Maratos@osec.usda.gov](mailto:Marie.Maratos@osec.usda.gov); [gludwig@almondboard.com](mailto:gludwig@almondboard.com); Mike Leggett; [kunkel@AESOP.Rutgers.edu](mailto:kunkel@AESOP.Rutgers.edu); [John.Johnston@fsis.usda.gov](mailto:John.Johnston@fsis.usda.gov); [amelia.jackson-gheissari@bayer.com](mailto:amelia.jackson-gheissari@bayer.com); [heidi.irrig@syngenta.com](mailto:heidi.irrig@syngenta.com); [Peter.Horne@fmc.com](mailto:Peter.Horne@fmc.com); Herndon, George; [Ruihong.Guo@ams.usda.gov](mailto:Ruihong.Guo@ams.usda.gov); [guerrero\\_raul\\_j@yahoo.com](mailto:guerrero_raul_j@yahoo.com); [mgaines@afia.org](mailto:mgaines@afia.org); [gflanley@sherpa360.com](mailto:gflanley@sherpa360.com); [Lesley.Ett@fas.usda.gov](mailto:Lesley.Ett@fas.usda.gov); Michal Eldan; Doherty, Michael; [defrancj@science.oregonstate.edu](mailto:defrancj@science.oregonstate.edu); Dawson, Jeffrey; [JCranney@CCOC.org](mailto:JCranney@CCOC.org); Lydia Cox; [Terry.Councell@fda.hhs.gov](mailto:Terry.Councell@fda.hhs.gov); [cheryl.cleveland@basf.com](mailto:cheryl.cleveland@basf.com); [Robin.Charlton@valent.com](mailto:Robin.Charlton@valent.com); [Julie.Chao@fas.usda.gov](mailto:Julie.Chao@fas.usda.gov); [billb@bryantchristie.com](mailto:billb@bryantchristie.com); [bbooren@gmaonline.org](mailto:bbooren@gmaonline.org); [marian.bleeke@bayer.com](mailto:marian.bleeke@bayer.com); [kimb@bryantchristie.com](mailto:kimb@bryantchristie.com); [jbaron@aesop.rutgers.edu](mailto:jbaron@aesop.rutgers.edu); [barney@AESOP.Rutgers.edu](mailto:barney@AESOP.Rutgers.edu); [john.abbott@syngenta.com](mailto:john.abbott@syngenta.com)

**Cc:** James Nyangulu; JESSE SEVCIK; Booren, Betsy; Bill Barney; Greg Watson; Maratos, Marie - OSEC, Washington, DC

**Subject:** RE: U.S. CCPR Interest Group - October Kickoff Meeting for CCPR-52

Dear U.S. CCPR Interest Group,

Per the email below, we wanted to send you a reminder that nominations for the CCPR Schedule/Priority List are due from the U.S. Delegation to CCPR by **November 30, 2020**.

Further instructions are provided in the previous email from October 8<sup>th</sup>, but we have asked that you submit nominations to the US Delegation by **Friday, November 8, 2020**. To submit a nomination for consideration by the US Delegation to CCPR, please respond electronically to David Miller ([Miller.DavidJ@epa.gov](mailto:Miller.DavidJ@epa.gov)) and Aaron Niman ([Niman.Aaron@epa.gov](mailto:Niman.Aaron@epa.gov)).

We would also appreciate if you could send us an email this week if you are planning to submit a nomination. That help us make sure we have all the nominations accounted for in advance of the November 30<sup>th</sup> deadline.

Thanks,

-Aaron

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**From:** Niman, Aaron

**Sent:** Thursday, October 8, 2020 9:23 AM

**To:** [Stephanie.Swinehart@usda.gov](mailto:Stephanie.Swinehart@usda.gov); [anna.gore@usda.gov](mailto:anna.gore@usda.gov); [mbasu@croplifeamerica.org](mailto:mbasu@croplifeamerica.org); [gforrer@whwg.com](mailto:gforrer@whwg.com); [dmanchester@croplifeamerica.org](mailto:dmanchester@croplifeamerica.org); [gregory.watson@bayer.com](mailto:gregory.watson@bayer.com); [mhoagland@central.com](mailto:mhoagland@central.com); [Leslie.Garcia@valent.com](mailto:Leslie.Garcia@valent.com);

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**Cc:** James Nyangulu <james.nyangulu@bayer.com>; JESSE SEVCIK <sevcik\_jesse\_jonathan@elanco.com>; Booren, Betsy <BBooren@consumerbrandsassociation.org>; Bill Barney <barney@njaes.rutgers.edu>; Greg Watson <greg.watson@bayer.com>; Maratos, Marie - OSEC, Washington, DC <marie.maratos@usda.gov>  
**Subject:** RE: U.S. CCPR Interest Group - October Kickoff Meeting for CCPR-52

Dear U.S. CCPR Interest Group,

We look forward to speaking with you today and have attached the meeting agenda for your reference (this can also be found attached to the meeting calendar notice).

We have also previously shared the CCPR Schedule/Priority List broadcast letter for new nominations for 2022 and beyond (issued by Karina Budd of the Australian Delegation). This letter is attached for your reference, along with the current CCPR Schedule/Priority List.

As we with previous years, the U.S. delegation will coordinate submission of U.S. nominations. If you are interested in making a nomination, please let the U.S. Delegation know as soon as possible and review the broadcast letter and addition instructions below.

### **U.S. Stakeholder Instructions**

The Codex Electronic Working Group (eWG) on Priorities has requested additional nominations to the Priority List of Pesticides from the U.S. Delegation, to be considered at the next CCPR meeting. Nominations are due to CCPR by **November 30, 2020**.

Please aim to submit nominations to the US Delegation on or before **Friday, November 8, 2020**. To submit a nomination for consideration by the US Delegation to CCPR, please respond electronically to David Miller (Miller.DavidJ@epa.gov) and Aaron Niman (Niman.Aaron@epa.gov) and fill out the attached nomination form ("Nomination Form for CCPR Blank.doc"). Please also review the draft Priority Lists of Pesticides attachment for any updates (commodities, field trial information, etc.) or opportunities to reschedule currently scheduled compounds.

Information on the CCPR schedule and priority list is provided in the attached letter and Excel spreadsheet and also available on the "**CCPR-Priorities-2019**" Forum on the Codex IT Platform. As described in the eWG broadcast letter and summarized below, the 2020 schedule is closed and open for nominations for 2020 and beyond.

CCPR Annual Schedule	Open for Nominations
<b>2021 Normal JMPR Meeting</b>	<b>Closed*</b>
<ul style="list-style-type: none"> <li>• <b>New Compounds:</b> Six new compounds are confirmed on the EWG schedule/priority list (Isoflucypram, Tricyclazole, Broflanilide, Benzpyrimoxan, Fluindapyr, Fluazaindolizine).</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>New Uses &amp; Other Evaluations:</b> 24 reviews spots are confirmed on the EWG schedule/priority list, including 7 have been requested to be evaluated at the May 2021 extraordinary meeting</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Periodic Reviews:</b> Six compounds are listed for periodic review: Dimethoate (027), Quintozene (64), Ethoxyquin (35), Aldicarb (117), Prochloraz (142), Guazatine (114). Chlorpyrifos is also listed a RESERVE compound.</li> </ul>	
<b>2022 Proposed Schedule</b>	<b>Open</b>
<ul style="list-style-type: none"> <li>• <b>New Compounds:</b> Six new compounds are listed on the EWG schedule/priority list (Fluazinam, Isotianil, Fluoxapiprolin, SYN547407, Acynonapyr, and SYN522). Only 2 compounds (fluazinam and isotianil) are confirmed in the schedule following submission of supporting evidence for national registration. For the remaining 4 compounds, submission of national registration evidence is critical to confirm a place on the proposed schedule.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>New Uses and Other Evaluations:</b> 15 compounds are listed on the EWG schedule/priority list. 10 nominations for the compounds are confirmed in the proposed schedule following submission of national registration evidence.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Periodic Reviews:</b> Six compounds are listed for periodic review: Chlorpyrifos (17), Dithiocarbamates (105), Iprodione (111), Carbendazim (72), Hydrogen phosphide, (zinc and aluminium salts) (46), and Fenthion (39). Malathion (49) and Pirimicarb (101) are listed as RESERVE.</li> </ul>	
<b>2022 &amp; Beyond</b>	<b>Open</b>
<ul style="list-style-type: none"> <li>• Nominations will be accepted for new compounds and new uses/other evaluations.</li> </ul>	

\* Subject to agreement by the JMPR Secretariat, and in consultation with the nominating country / manufacturer, commodities may be added or deleted for both new compounds and 'new use evaluations' listed on the 2021 schedule.

#### **Additional Instructions:**

- We ask that nominators fill out the attached blank nomination form, including the table at the top.
  - For new chemical nominations, additional uses for scheduled compounds, or additional uses for compounds not currently scheduled- Please complete and return the attached nomination form. A complete nomination form is especially important for chemicals that have not been reviewed by JMPR in the past.
  - If you are a commodity representative/grower, please provide the following information in lieu of the nomination form: Contact, chemical requested, commodity, pest issue, and any other relevant information. The U.S. Delegation will work with registrants/IR-4 to determine available data and support for any of these requests.

Thanks,

-Aaron

-----Original Appointment-----

**From:** Niman, Aaron

**Sent:** Thursday, September 24, 2020 1:56 PM

**To:** Niman, Aaron; [Stephanie.Swinehart@usda.gov](mailto:Stephanie.Swinehart@usda.gov); [anna.gore@usda.gov](mailto:anna.gore@usda.gov); [mbasu@croplifeamerica.org](mailto:mbasu@croplifeamerica.org); [gforrer@whwg.com](mailto:gforrer@whwg.com); [dmanchester@croplifeamerica.org](mailto:dmanchester@croplifeamerica.org); [gregory.watson@bayer.com](mailto:gregory.watson@bayer.com); [mhoagland@central.com](mailto:mhoagland@central.com); [Leslie.Garcia@valent.com](mailto:Leslie.Garcia@valent.com); [Epstein@nwhort.org](mailto:Epstein@nwhort.org); Wilkins, Nancy; [yen\\_wu@mccormick.com](mailto:yen_wu@mccormick.com); [CodyWilson@coca-cola.com](mailto:CodyWilson@coca-cola.com); Dana Vogel; Blandine Trouille; Dave Trinka; [carmen.tiu@corteva.com](mailto:carmen.tiu@corteva.com); [selen.stromgren@fda.hhs.gov](mailto:selen.stromgren@fda.hhs.gov); [Matthew.Strietzel@bryantchristie.com](mailto:Matthew.Strietzel@bryantchristie.com); [jane.stewart@basf.com](mailto:jane.stewart@basf.com); [Ann.Stevenson@bryantchristie.com](mailto:Ann.Stevenson@bryantchristie.com); [SSpaulding@central.com](mailto:SSpaulding@central.com); [csmith@gowanco.com](mailto:csmith@gowanco.com); [jsevcik@elanco.com](mailto:jsevcik@elanco.com); [tscholz@usapulses.org](mailto:tscholz@usapulses.org); [mike@cmschofieldconsulting.com](mailto:mike@cmschofieldconsulting.com); Jason Sandahl; [Rluisa1@aol.com](mailto:Rluisa1@aol.com); [Mark.Rasmussen@fas.usda.gov](mailto:Mark.Rasmussen@fas.usda.gov); C. Price; Phang,

Whang; James Nyangulu; Douglas Nelson; Miller, David; [Sara.Mcgrath@fda.hhs.gov](mailto:Sara.Mcgrath@fda.hhs.gov); [rmcallister@croplifeamerica.org](mailto:rmcallister@croplifeamerica.org); [Marie.Maratos@osec.usda.gov](mailto:Marie.Maratos@osec.usda.gov); Gabriele Ludwig; [LeggettM@iskbc.com](mailto:LeggettM@iskbc.com); Dan Kunkel; John Johnston; [amelia.jackson-gheissari@bayer.com](mailto:amelia.jackson-gheissari@bayer.com); Heidi Irrig; [Peter.Horne@fmc.com](mailto:Peter.Horne@fmc.com); Herndon, George; [Ruihong.Guo@ams.usda.gov](mailto:Ruihong.Guo@ams.usda.gov); [guerrero\\_raul\\_j@yahoo.com](mailto:guerrero_raul_j@yahoo.com); [mgaines@afia.org](mailto:mgaines@afia.org); Gretchin E. Flanley; [Lesley.Ett@fas.usda.gov](mailto:Lesley.Ett@fas.usda.gov); [meldan@luxpam.com](mailto:meldan@luxpam.com); Doherty, Michael; Joe DeFrancesco; Jeff Dawson; [JCranney@CCQC.org](mailto:JCranney@CCQC.org); Lydia Cox; [Terry.Councell@fda.hhs.gov](mailto:Terry.Councell@fda.hhs.gov); Cheryl Cleveland; [Robin.Charlton@valent.com](mailto:Robin.Charlton@valent.com); Julie Chao; Bill Bryant; [bbooren@gmaonline.org](mailto:bbooren@gmaonline.org); [marian.bleeke@bayer.com](mailto:marian.bleeke@bayer.com); Kimberly Berry; Jerry Baron; Bill Barney; John Abbott

**Cc:** James Nyangulu; JESSE SEVCIK; Booren, Betsy; Bill Barney; Greg Watson; Maratos, Marie - OSEC, Washington, DC

**Subject:** U.S. CCPR Interest Group - October Kickoff Meeting for CCPR-52

**When:** Thursday, October 8, 2020 3:00 PM-4:00 PM (UTC-05:00) Eastern Time (US & Canada).

**Where:** Skype Meeting

#### Agenda:

1. Roll Call
2. Introduction
3. Approval of Agenda
4. Discussion Topics
  - a. U.S. Delegation Planning for CCPR-52
    - i. April 12-17, **Location TBD** | [CCPR-52 Event Page](#)
    - ii. [Current Agenda](#)
    - iii. Review CCPR-52 Timeline & Milestones (See Attachment 1)
    - iv. Concern Forms
  - b. CCPR Call for Nominations
  - c. Update on JMPR
    - i. Regular 2020 Meeting (Postponed)
    - ii. 2021 Extraordinary Meeting, 12 - 21 May 2021, Location Rome
    - iii. 2021 Regular Meeting, September 2021, Location TBD
    - iv. Data Calls
      - [JMPR 2021 May Extraordinary: Call for Data](#) (Deadline: Sept 30)
      - JMPR 2021 Regular Meeting (TBD, December Deadline)
  - d. Update CAC-43
5. Additional Business

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English (United States)

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